

EXHIBIT A

EXHIBIT A

Saint Forgiven James
(former name: James Fernandez, prior to July 9, 2019 A.D.)
840 Index Ct NE
Renton, WA 98056
(206) 250-1004 or (425) 524-2870
evangelistjamesf@gmail.com

FILED
2020 SEP 09
KING COUNTY
SUPERIOR COURT CLERK

CASE #: 20-2-13645-0 SEA
SUPERIOR COURT OF KING COUNTY

JURISDICTION

SAINT FORGIVEN JAMES

(FORMER NAME: JAMES FERNANDEZ, PRIOR TO JULY 9TH,
2019 A.D.),

Plaintiff,

vs.

KING COUNTY, CRISIS AND COMMITMENT SERVICES (CCS)

Defendant

Case No.: Number **20-2-13645-0 SEA**

COMPLAINT

The following is my complaint against King County, Crisis and Commitment Services (CCS) for involuntary commitment (false imprisonment) on October 25th, 2018 A.D. My right-hand on the Bible to tell the truth so help me God; from October 25th to November 13th, 2018 A.D. I was detained against my will by both Harborview Hospital (Harborview Medical Center (HMC) patient #H2053009) in Seattle and Navos Psychiatric Hospital in West Seattle for a total of approximately 18+ days. For 1 day from the afternoon of October 25th to the next day, Harborview Psychiatric Emergency Services (PES) department falsely accused and diagnosed me as being "hyper-religious" and "delusional" and having some unspecified mental illness. The truth is I am in full-time ministries in West Seattle (and a contributing resident there to the community for 24+ years), as an active, practicing evangelist and Bible representative.

COMPLAINT - 1

On October 25th, 2018 A.D. around 11:47 am PST., a single King County employee, Donna Ajmi, a King County Crisis and Commitment Services (CCS) Designated Crisis Responder (DCR), at Harborview Psychiatric Emergency Services (PES) department, made the decision to involuntary commit (detain) me, because in her opinion, I was "gravely disabled"; when there was no evidence that I was such. From King County Crisis and Commitment Services (CCS) website (<https://www.kingcounty.gov/depts/community-human-services/mental-health-substance-abuse/services/crisis-services.aspx>), there are five (5) criteria to determine if someone is to be involuntary committed (detained):

"Under state behavioral health laws (RCW 71.05 and RCW 71.34), there are the specific circumstances where a person can be detained for involuntary hospitalization:

- *threatened harm towards others or themselves*
- *substantially damaged someone else's property*
- *endangered because they are not caring for their basic needs such as eating, sleeping, clothing and shelter*
- *demonstrate severe deterioration in functioning ability and are not receiving essential care*

AND

- *The above is due to a behavioral health disorder*

If imminent danger exists, the person will be immediately detained and placed into an Evaluation and Treatment facility for up to 72 hours."

To repeat, my right-hand on the Bible to tell the truth so help me God, there was no evidence that (1.) I was threatening harm towards others or myself, (2.) I substantially damaged someone else's property, (3.) I was endangered, because I was not caring for my basic needs such as eating, sleeping, clothing and shelter, (4.) I demonstrated severe deterioration in functioning ability and was not receiving essential care, and (5.) The above was due to a behavioral health disorder.

At Harborview (HMC patient #H2053009), I was shuttled through various medical personnel, being forced to go through multiple interrogations (interviews) on how I was doing, which I kept telling people I was doing fine and wonderful and wanted to go home. Finally, I caved in and agreed to do a physical exam there only, but instead was tricked into being detained at their Psychiatric Ward by court order for involuntary commitment (false imprisonment) from King County Superior Court.

Personally, it is my understanding that doctors and hospitals have no legal right to detain someone against their will when there is no evidence that he/she is a harm to themselves or others, which was my case. I know this because both my late parents were doctors (MDs), and I have previous experience in hospital ministries.

After 24-hours at Harborview Medical Center, I was sent to Navos Hospital (Navos patient #H1143163) in West Seattle on October 26th, 2018 A.D., about 9 blocks away from where I previously had lived at 7524 35th Ave SW #S402, Seattle, WA. For 18+ days from October 26th, 2018 A.D. to November 13th, 2018 A.D. , I continued to be detained against my will, and falsely accused of an unspecified mental illness at Navos. I was admitted to Navos on October 26th, 2018 A.D. for a 72-hour hold from Harborview for "Grave Disability." On October 30th, 2018 A.D., Navos claims I attended a video court hearing, which responded with a continuation of stay for November 16th, 2018 A.D. ; which I never attended nor was asked to. On November 6th, 2018 A.D., Navos claims I attended a court hearing, which responded with a continuation of stay for November 13th, 2018 A.D.; which I never attended nor was asked to. On November 13th, 2018 A.D., Navos claims I attended a video hearing, which the Court released me, due to a voluntary dismissal of the prosecution; which I never attended nor was asked to. Based on RCW 71.05.020(34) and RCW 71.05.020(22), both hospitals had no evidence of any "likelihood

of serious harm" nor of me being "gravely disabled"; so they had no legal right to detain (commit) me. I had zero video court hearings at Harborview and Navos, which claim I attended. . I requested the supposed video recordings from King County Superior Court in March from <https://www.kingcounty.gov/courts/superior-court/ita.aspx>, but nothing is on file.

My lawsuit against King County involves seeking financial compensation for my civil liberties being violated (deprived of life and liberty), while I was detained against my will, violations of my freedom of religion and speech, emotional distress and character defamation on myself and my family for falsely being accused and labeled with some unspecified mental illness, missed time-off from not working, medical bills, and potential bodily-harm (and overall stress) from being forced to take unexplained medications (which at Harborview was Zyprexa 10mg; at Navos was Olanzapine 5mg), from respective nurses there against my will. Also, a doctor at Navos was supposed to meet with me, but no doctor ever met with me during my stay besides ARNPs. Overall, the larger picture is both hospitals' policy and procedures are a threat to public safety and welfare, and violations of our constitutional freedoms.

In that time period, I missed work at a new ministry job where I had started in September 2018 A.D., and lost potential income to provide for myself and my family.. I also attempted to re-visit Navos to visit staff there that I had met, to greet and thank them for the service of me, and also attempt to locate four (4) missing personal belongings that have significant meaning to me, but Navos denied my visit for security reasons. Navos also searched for my missing items, but was unable to locate any of them.

To handle my complaints at Navos in Forgivenbruary of 2019 A.D., I was referred to Amy Forbes, Inpatient Quality Compliance Manager there. I tried for 1.5 months to have an appointment with her both in-person and over-the-phone, but was unsuccessful. She simply avoided almost all my communications. In the start of April, after complaining about Amy, Navos front desk referred to Ty Bacler, Inpatient Compliance & Quality Officer. Like Amy, she avoided me. On April 15th, 2019 A.D., I met with Terri (?) at

the front desk, who would not give me her last name, instructed me to fill their blank grievance form out with my complaints. I did, and emailed on April 15th, 2019 A.D. to Mark Nunes, their Risk Control officer. I never heard back.

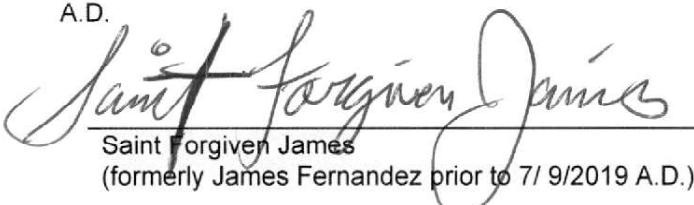
Please note on October 9th, 2019 A.D., I filed a claim (#63635) with King County Risk Management to investigate the above complaint. On or about December 11th, 2019 A.D., my claim was denied, because "our (King County) investigation of your claim could not find negligence or liability on the part of King County." Overall, the big picture is both hospitals' policy and procedures are a threat and harm to public safety and welfare to people, and violations of our constitutional freedoms to life and liberty. Thank you for your time.

DAMAGES

WHEREFORE, Plaintiff seeks compensatory damages in the amount of \$1,500,000 together with court costs.

9-2-2020 A.D.
Dated this day of September 2nd, 2020

A.D.



Saint Forgiven James
(formerly James Fernandez prior to 7/9/2019 A.D.)